

These comments are frpm Barry Broadcasting Co, licensee of WBCH-AM and WBCH-FM, Hastings, Michigan. Our city of license has a population of 7,095.

I urge the Commission to exempt small market stations from the proposal that broadcasters retain recordings of their programming between the hours of 6a-10p daily. I see this as a totally unnecessary burden in terms of buying the recording equipment and then the continuing cost for the manpower and added workload that would be required to maintain and retain and catalog the tapes.

I have been at WBCH since 1958. Over these 46 years I can attest that we have never received any public complaint concerning the broadcasting of any obscene material.

I think it is important for the Commission to understand that we are in an "unrated market." Unlike some high power stations in larger markets my station has never felt the necessity of compromising our principals for the sake of trying to achieve higher Arbitron ratings. Such stations live and die by the ratings book and if comments on the edge attract listeners, they go for it. If caught, the fine is just a cost of doing business to them and higher ratings pay off for them in a very big way. To small market stations such a fine would put us out of business. Perhaps we are just about at a point where broadcast regulations should be different for the conglomerates than the rules for small market stations because, in short, I do not believe the small market stations are the problem, so why attempt to burden us with new rules and regulations?

The Commission already knows the identity of the stations that have been the subject of complaints from the public. Therefore fairness would seem to dictate that only those few offending stations should have to take on the responsibility of recording their programming daily.

As for the rest of us, our own code of ethics and the close proximity we have with community leaders, business people (our clients), our church family and the numerous organizations we are involved with, to say nothing of the relationship we have with our listeners who favor us by tuning in our stations, more than takes care of our need and desire to serve our communities with good, clean programming in the public interest, convenience and necessity. Our listeners deserve nothing less. Please don't punish the small market broadcasters of America !

Respectfully submitted,
Kenneth R. Radant, President-G.M.
WBCH AM-FM
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